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Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JAMES CRAIG,

Plaintiff,

vs.

KILILO KIJAKAZI,
Acting Commissioner of Social Security,

Defendant.

Case No.: 2:22-cv-01314-DJA

**MOTION FOR EXTENSION OF TIME TO
FILE CERTIFIED ADMINISTRATIVE
RECORD AND ANSWER**

(FIRST REQUEST)

1 Defendant Kilolo Kijakazi, Acting Commissioner of Social Security, by and through her
2 undersigned attorneys, hereby moves for a 60-day extension of time to file the Certified Administrative
3 Record (CAR) and answer to Plaintiff's Complaint. The CAR and answer to Plaintiff's Complaint are
4 currently due to be filed by October 31, 2022. This is the Commissioner's first request for an extension
5 of time.

6 Defendant submits that good cause exists for this extension request. The Office of Appellate
7 Operations (which prepares and certifies the certified administrative record) requires additional time to
8 prepare the CAR in this case. The undersigned apologizes for this delay. The undersigned has requested
9 that OAO complete the CAR within 60 days of the current deadline.

10 Accordingly, Defendant requests an extension in which to respond to the Complaint until
11 December 30, 2022. The undersigned attempted to confer with Plaintiff's counsel and has been unable to
12 ascertain Plaintiff's counsel's position on this motion.

13 It is therefore respectfully requested that Defendant be granted an extension of time to file the CAR
14 and answer to Plaintiff's Complaint, through and including December 30, 2022.

15 Dated: October 27, 2022

16 JASON M. FRIERSON
United States Attorney

17 /s/ Sohayl Vafai
18 SOHAYL VAFAI
Special Assistant United States Attorney
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CERTIFICATE OF SERVICE

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 160 Spear Street, Suite 800 San Francisco, California 94105. I am not a party to the above-entitled action. On the date set forth below, I caused service of **MOTION FOR EXTENSION OF TIME TO FILE CERTIFIED ADMINISTRATIVE RECORD AND ANSWER** on the following parties by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which provides electronic notice of the filing:

John B. Shook
johnshook@shookandstone.com
Attorney for Plaintiff

I declare under penalty of perjury that the foregoing is true and correct.

Dated: October 27, 2022

/s/ Sohayl Vafai

Special Assistant United States Attorney

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Attorneys for Defendant

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

JAMES CRAIG,

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KILILO KIJAKAZI,

Acting Commissioner of Social Security

Defendant.

Case No.: 2:22-cv-01314-DJA

~~PROPOSED~~ ORDER GRANTING
DEFENDANT'S MOTION FOR EXTENSION
OF TIME

1 Based upon Defendant's Motion for Extension of Time, and for good cause shown, **IT IS**
2 **ORDERED** that Defendant file the Certified Administrative Record and answer to Plaintiff's Complaint
3 by no later than December 30, 2022.

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6 IT IS SO ORDERED:

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9 HON. DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE

10 DATED: October 28, 2022
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